Resolute Forest Products – Catawba Mill
5300 Cureton Ferry Road
Post Office Box 7
Catawba, SC 29704-0007

FED EX NO. 8071 4221 5633

July 14, 2015

Mr. Heinz Kaiser, Manager
Air Toxics Section
SCDHEC Bureau of Air Quality
2600 Bull Street
Columbia SC 29201-1708

Re: Resolute Forest Products – Catawba Operations
Permit No. TV-2440-0005

Dear Mr. Kaiser:

The purpose of this submittal is to meet the semi-annual reporting requirements applicable to the Catawba Mill associated with the National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry (40 CFR 63, Subpart S). This submittal meets the requirements for both the Periodic Startup, Shutdown, and Malfunction (SSM) Report and the Excess Emissions and Continuous Monitoring System (CMS) Performance Report pursuant to Sections 63.10(d)(5)(i) and 63.10(e)(3), respectively.

Excess emissions and CMS downtime for the reporting period were less than 1% and 5% respectively for all systems, except the Condensate Collection and Treatment System. Only the summary reports are attached as allowed in Section 63.10(e)(3)(vii). For the Condensate Collection and Treatment System, more information is provided as required by Section 63.10(e)(3)(viii). For SSM purposes when an emission has occurred, specific information about the type and duration is reported on the enclosed log(s).

The total of steam stripper downtime plus time of excess emissions during the reporting period did not exceed ten percent as allowed in Section 63.446(g). Actions taken during SSM events, including corrective actions, were consistent with the procedures specified in the SSM Plan for this facility.

Based on information and belief formed after reasonable inquiry, I certify to the best of my knowledge, that the statements and information in this submission are true, accurate, and complete.

If you have any questions or require additional information, please contact Dale Herendeen at (803) 981-8009.

Sincerely,

Patrick Moore
General Manager

PM/dlh
File 231.14

Enclosures

cc: EPA Region 4
Zach Pensa, Midlands EQC Lancaster

SUMMARY REPORT

GASEOUS AND OPACITY EXCESS EMISSION AND CONTINUOUS MONITORING SYSTEM PERFORMANCE

HAP(s) Monitored:	Chlorine
Time Period:	3-Hour Average
Reporting Period:	January 1, 2015 through June 30, 2015
Process Unit Description:	Bleach Plant Scrubber System
Company:	Resolute Forest Products – Catawba Mill
Emission Limits:	Scrubber Outlet Conc. <10 ppmv Cl_2 (40 CFR 63.445 (c)(2))
Operating Parameters:	Scrubber liquid influent (recirculation) flow > 50 gpm Scrubber effluent pH > 9.7 Scrubber fan operational status - ON
Monitor Manufacturer(s) and Model Number(s):	Liquid flow / Foxboro IMT24 PDAB810MAB pH / TBI TBX557-J1E11f20JB
Last CMS Certification or Audit Date:	Flow Meter Audit (Calibration): March 13, 2015 pH (Calibration): May 1, 2015

Total Source Operating Time in Reporting Period: 4,307 hours

EMISSION DATA SUMMARY

Reason for Excess Emissions	Duration
A. Startup/Shutdown	0 Hour
B. Malfunctions	
Process/Instrument System	0 Hour
Control/Operating/Collection	0 Hour
Other Known Cause	0 Hour
Other Unknown Cause	0 Hour
Total Number of Incidents	0
Excess Emissions / Process Operating Time	0.00 %

CMS PERFORMANCE SUMMARY

Reason for Monitor Downtime	Duration
Monitor Equipment Malfunctions	0 Hour
Non-Monitor Equipment Malfunctions	0 Hour
Quality Assurance/Quality Assurance Calibrations	0 Hour
Other Known Causes	0 Hour
Other Unknown Causes	0 Hour
Total Number of Incidents	0
Percent Monitor Downtime	0.00 %

There were no changes in the continuous monitoring systems, processes, or control devices since the last reporting period.

Based on data provided, reasonable inquiry, and the best of my abilities, I certify that the information contained in this report is accurate and complete.

Name/Title: Patrick Moore General Manager

Signature: _____

SUMMARY REPORT

GASEOUS AND OPACITY EXCESS EMISSION AND CONTINUOUS MONITORING SYSTEM PERFORMANCE

HAP(s) Monitored:	Methanol
Time Period:	15-day rolling average
Reporting Period:	January 1, 2015 through June 30, 2015
Process Unit Description:	Condensate Collection and Treatment System
Company:	Resolute Forest Products – Catawba Mill
Emission Limits:	Collect 11.1 lbs. Methanol/ODTUBP (40 CFR 63.446 (c)(3)) Treat (remove) 10.2 lbs. Methanol/ODTUBP (40 CFR 63.446 (e)(5))
Operating Parameters:	Condensate Feed Rate, Condensate Feed Temperature, Steam Flow Effective Steam Ratio (condensate feed rate / (steam flow to column less steam for condensate preheat) > 16 = 92%
Monitor Manufacturer(s) and Model Number(s):	Condensate Flow – Rosemount /3051CD2A22A1JB4L4M6 Steam Flow - Rosemount /3051CD2A22A1JB4L4M6 Condensate Temperature – Rosemount/3144D5E5B4T1M5
Last CMS Certification or Audit Date:	N/A (all critical instruments are calibrated annually)
Total Source Operating Time in Reporting Period:	4,014 hours

EMISSION DATA SUMMARY

Reason for Excess Emissions	Duration
A. Startup/Shutdown	0 Hour
B. Malfunctions	0 Hour
Process/Instrument System	0 Hour
Control/Operating/Collection	0 Hour
Other Known Cause	336.0 Hours
Other Unknown Cause	0 Hour
Total Number of Incidents	1
Excess Emissions / Process Operating Time	8.37 %

CMS PERFORMANCE SUMMARY

Reason for Monitor Downtime	Duration
Monitor Equipment Malfunctions	0 Hour
Non-Monitor Equipment Malfunctions	0 Hour
Quality Assurance/Quality Assurance Calibrations	0 Hour
Other Known Cause	0 Hour
Other Unknown Cause	0 Hour
Total Number of Incidents	0
Percent Monitor Downtime	0.0 %

There were no changes in the continuous monitoring systems, processes, or control devices since the last reporting period.

Based on data provided, reasonable inquiry, and the best of my abilities, I certify that the information contained in this report is accurate and complete.

Name/Title: Patrick Moore General Manager

Signature: _____

SUMMARY REPORT

GASEOUS AND OPACITY EXCESS EMISSION AND CONTINUOUS MONITORING SYSTEM PERFORMANCE

HAP(s) Monitored:	Methanol
Time Period:	Hours
Reporting Period:	January 1, 2015 through June 30, 2015
Process Unit Description:	LVHC System – Combination Boilers
Company:	Resolute Forest Products – Catawba Mill
Emission Limits:	Reduce total HAP emission using a boiler, lime kiln, or recovery furnace by introducing the HAP emission stream with the primary fuel or into the flame zone. Total excess emission less than 1% excluding SSM plan excess emissions.
Operating Parameters:	N/A
Monitor Manufacturer(s) and Model Number(s):	N/A
Last CMS Certification or Audit Date:	N/A
Total Source Operating Time in Reporting Period:	4,014 hours

EMISSION DATA SUMMARY

	Reason for Excess Emissions	**Duration**
	A. Startup/Shutdown	0.0 Hour
Note: Specific incidents are shown on the attached log for. SSM purposes	B. Malfunctions	
	Process/Instrument System	9.6 Hours
	Control/Operating/Collection	0.0 Hour
	Other Known Cause	5.7 Hours
	Other Unknown Cause	0.1 Hour

Total Number of Incidents	32
Excess Emissions / Process Operating Time	0.38 %
Total Duration of Excess Emissions excluding SSM Plan Excess Emissions/ Process Operating Time	0.14 %

CMS PERFORMANCE SUMMARY

A CMS is not required when LVHC gases are incinerated in a combination boiler.

There were no changes in the continuous monitoring systems, processes, or control devices since the last reporting period.

Based on data provided, reasonable inquiry, and the best of my abilities, I certify that the information contained in this report is accurate and complete.

Name/Title: Patrick Moore General Manager

Signature: _____

SUMMARY REPORT

GASEOUS AND OPACITY EXCESS EMISSION AND CONTINUOUS MONITORING SYSTEM PERFORMANCE

HAP(s) Monitored:	Methanol
Time Period:	Hours
Reporting Period:	January 1, 2015 through June 30, 2015
Process Unit Description:	HVLC System – Combination Boilers
Company:	Resolute Forest Products – Catawba Mill
Emission Limits:	Reduce total HAP emission using a boiler, lime kiln, or recovery furnace by introducing the HAP emission stream with the primary fuel or into the flame zone. Total excess emission less than 4% excluding SSM plan excess emissions.
Operating Parameters:	N/A
Monitor Manufacturer(s) and Model Number(s):	N/A
Last CMS Certification or Audit Date:	N/A
Total Source Operating Time in Reporting Period:	4,014 hours

EMISSION DATA SUMMARY

	Reason for Excess Emissions	**Duration**
	A. Startup/Shutdown	0.0 Hour
Note: Specific incidents are shown on the attached log for. SSM purposes	B. Malfunctions	
	Process/Instrument System	1.8 Hours
	Control/Operating/Collection	0.2 Hour
	Other Known Cause	0.0 Hour
	Other Unknown Cause	0.1 Hour

Total Number of Incidents	7
Excess Emissions / Process Operating Time	0.05 %
Total Duration of Excess Emissions excluding SSM Plan Excess Emissions/ Process Operating Time	0.00 %

CMS PERFORMANCE SUMMARY

A CMS is not required when HVLC gases are incinerated in a combination boiler.

There were no changes in the continuous monitoring systems, processes, or control devices since the last reporting period.

Based on data provided, reasonable inquiry, and the best of my abilities, I certify that the information contained in this report is accurate and complete.

Name/Title: Patrick Moore General Manager

Signature: _____

SEMI-ANNUAL REPORT

GASEOUS AND OPACITY EXCESS EMISSION AND CONTINUOUS MONITORING SYSTEM PERFORMANCE

HAP(s) Monitored:	Methanol
Reporting Period:	January 1, 2015 through June 30, 2015
Process Unit Description:	Condensate Collection and Treatment System
Company:	Resolute Forest Products – Catawba Mill
Emission Limits:	Collect 11.1 lbs. Methanol/ODTUBP (40 CFR 63.446 (c)(3)) Treat (remove) 10.2 lbs. Methanol/ODTUBP (40 CFR 63.446 (e)(5))
Operating Parameters:	Condensate Feed Rate, Condensate Feed Temperature, Steam Flow, Effective Steam Ratio (condensate feed rate / (steam flow to column less steam for condensate preheat) > 16 = 92%

§63.10(c)(5): Date / time during which the CMS was inoperative except for zero and high-level checks:	None
§63.10(c)(6): Date / time during which the CMS was out of control:	None
§63.10(c)(7): Specific identification of each period of excess emissions and parameter monitoring exceedances, that occurs during startups, shutdowns, and malfunction of the affected source:	Daily quantities of both Methanol Collected per ODTUBP and Methanol Removed per ODTUBP were low between 6/7/15 and 6/12/15, because the stripper was shut down for scheduled maintenance. The resulting 15-day averages ending on 6/10/15 through 6/23/15 were below the minimum allowable levels of 11.1 lbs/ODTP and 10.2 lbs/ODTP, respectively.
§63.10(c)(8): Specific identification of each period of excess emissions and parameter monitoring exceedances, that occurs during periods other than startups, shutdowns, and malfunction of the affected source:	N/A
§63.10(c)(10): Nature and cause of any malfunction:	The stripper was down for maintenance for 5 to 6 days while the Fiberline continued to operate.
§63.10(c)(11): Corrective action taken or preventive measures adopted:	The stripper was brought back online with full flow restored as soon as possible. Mill personnel will attempt to schedule future stripper maintenance coincident with Fiberline downtime.
§63.10(c)(12): Nature of repairs or adjustments to the CMS that was inoperative or out of control:	N/A
§63.10(c)(13): Total process operating time during the reporting period:	4,014 hours
§63.8(c)(7) and (8): Reporting requirements for a CMS that is out of control:	N/A

Based on data provided, reasonable inquiry, and the best of my abilities, I certify that the information contained in this report is accurate and complete.

Name/Title: Patrick Moore General Manager

Signature: _____